

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 17-11339TPA
	:	
PHILLIP JOHN MCCUMBER AND	:	
HEATHER LYNN WILKINSON, HIS WIFE,	:	HON. THOMAS P. AGRESTI
Debtors	:	
	:	
RUSHMORE LOAN MANAGEMENT	:	CHAPTER 13
SERVICES, LLC,	:	
Movant,	:	RELATED TO CLAIM NO. 21
	:	
v.	:	
	:	
PHILLIP JOHN MCCUMBER AND	:	
HEATHER LYNN WILKINSON, HIS WIFE;	:	
and RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,  
INC.

BY: /s/ Michael S. Jan Janin  
Michael S. Jan Janin, Esquire  
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Counsel for Debtors, Phillip John McCumber and  
Heather Lynn Wilkinson

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**CERTIFICATE OF SERVICE OF DECLARATION**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 15, 2020.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

Ronda J. Winnecour, Esquire, Chapter 13 Trustee  
[cmecf@chapter13trusteedpa.com](mailto:cmecf@chapter13trusteedpa.com)

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: December 15, 2020

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,  
INC.

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Counsel for Debtors, Phillip John McCumber and  
Heather Lynn Wilkinson